

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**PARTS iD, LLC**, a New Jersey limited liability company,  
**Plaintiff,**

**v.**

**IDPARTS LLC**, a Massachusetts limited liability company,  
**Defendant.**

Civil Action No. 20-cv-11253-RWZ

**JOINT MOTION FOR EXTENSION OF TIME**

Plaintiff/Counterclaim Defendant PARTS iD, LLC and Defendant/Counterclaim Plaintiff IDParts LLC, through counsel, jointly agree and stipulate to the further extensions of certain deadlines to permit the parties to complete party depositions in advance of discovery deadlines. In view of the upcoming discovery deadlines, the parties jointly request that the Court modify the schedule through and including the below dates. The parties ask that the below proposed schedule take precedent over the previously proposed schedule, which was filed on February 14, 2022 (Dkt. 78).

<b>Event</b>	<b>Current Deadline (Dkt. No. 28)</b>	<b>Proposed Deadline</b>
Completion of Discovery Deadline	February 24, 2022	May 16, 2022
Deadline for <i>Daubert</i> Motions and Dispositive Motions	February 24, 2022	June 13, 2022
Responses	March 17, 2022	July 5, 2022

Reply	March 28, 2022	July 18, 2022
Final Pretrial Conference	May 4, 2022	August 29, 2022, or at the Court's convenience
Trial Date and Length	TBA at Final Pretrial Conference	TBA at Final Pretrial Conference

The parties filed a Joint Stipulated Motion for an Extension of Time on September 24, 2021 (Dkt. 71) and the Court granted the request on September 30, 2021 (Dkt. 73). The parties then filed a second Joint Stipulated Motion for an Extension of Time on February 14, 2022 (Dkt. 78). Though that Stipulated Motion is still pending before the Court, by agreement of the parties, the parties have continued to work diligently to complete remaining discovery under their proposed schedule, and have taken, and are continuing to take, expert depositions. Counsel for the parties are continuing to work to find mutually agreeable dates to the remaining fact and expert depositions.

With regard to the depositions, the parties' ability to proceed with scheduling depositions for two fact witnesses, namely Steven Royzenshteyn and Roman Gerashenko, remains outside their control. Messrs. Royzenshteyn and Gerashenko are the founders of plaintiff PARTS iD LLC and PARTS iD identified them in its Initial Disclosures as individuals likely to have discoverable information that PARTS iD may use to support its claims. While it does not object to their depositions, PARTSiD has indicated that it will not be calling them at trial. However, Messrs. Royzenshteyn and Gerashenko are no longer employed by PARTS iD. Messrs. Royzenshteyn and Gerashenko individually moved to quash IDParts' subpoenas in the U.S. District Court for the District of New Jersey and the parties are waiting for that court to issue a

decision on the motion, which they hope to receive soon. *See PARTS ID, LLC v. IDPARTS, LLC*, D.N.J. Case No. 3:21-cv-19229-ZNG-LHG.

Although the parties remain hopeful that the depositions of fact witnesses can be completed promptly, it is possible that a ruling on the pending Motion to Quash Subpoenas will be issued with enough time to schedule the depositions by the proposed May 16, 2022 deadline. In the event the parties are still awaiting a ruling on the Motion to Quash Subpoenas, IDParts reserves its right to seek additional relief from this Court to allow it to take the depositions of Messrs. Royzenshteyn and Gerashenko and to attend to any additional discovery that may arise as a result of information gained through these depositions.

The parties therefore respectfully request that the Court enter the proposed order lodged herewith extending all scheduling deadlines.

Respectfully submitted,

/s/ John Strand

John Strand (BBO #654985)  
jstrand@wolfgreenfield.com  
Tonia A. Sayour, *Pro Hac Vice*  
tonia.sayour@wolfgreenfield.com  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
617.646.8000 Phone  
617.646.8646 Fax

*Counsel for IDParts LLC*

Dated: April 12, 2022

/s/ Aaron P. Bradford

Aaron P. Bradford, *Pro Hac Vice*  
1560 Broadway, Suite 1200  
Denver, CO 80202  
(303) 325-5467  
abradford@sheridanross.com

Daniel J. Cloherty (BBO #565772)  
Christian G. Kiely (BBO #684308)  
TODD & WELD LLP  
One Federal Street, 27th Floor  
Boston, MA 02110  
(617) 720-2626  
dcloherty@toddweld.com  
ckiely@toddweld.com

*Counsel for PARTS iD, LLC*

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Dated: April 12, 2022

*/s/ John Strand*

\_\_\_\_\_  
John Strand